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REMARKS

Claims 1-23 are pending, with claims 1, 5, 16 and 20 being independent. Reconsideration and allowance of the above-referenced application are respectfully requested.

Claims 8, 9 and 11 stand rejected under 35 U.S.C. 112, first paragraph, as allegedly failing to comply with the written description requirement. Each of these claims are originally filed claims, which form part of the specification. Thus, these claims are self supporting with respect to the written description requirement, and the rejection should be withdrawn for at least this reason. If believed desirable by the Patent Office, the subject matter of these claims will be copied into the specification.

Additionally, these claims are fully supported by the detailed description at page 5, lines 15-19, page 10, line 9 to page 11, line 1, and also by figures 5A to 6S and their corresponding description. For example, with respect to claim 8, the detailed description makes clear that three calls, socket(), bind() and listen(), can be translated to a single lightweight protocol message, JOIN_SERVICE on ServiceId. (See the specification at page 10, line 14 to page 11, line 1.) In view of this, withdrawal of the rejections under 35 U.S.C. 112 is respectfully requested.

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Claims 1, 3-6, 14-16, 18-20 and 22-24 stand rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Bach et al (US Patent 5,619,650) in view of Haviv (US Publication 2002/0059451). Claims 2, 13, 17 and 21 stand rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Bach and Haviv in further view of Sitbon et al (US Patent 5,568,487). Claims 7, 10 and 12 stand rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Bach and Haviv in view of Speight et al, 4th USENIX Windows Systems Symposium Paper 2000, Pp. 113-124 of the Proceedings, August 3-4, 2000. Claims 8 and 11 stand rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Bach, Haviv and Speight in further view of Kinkade (US Publication 2001/0034782). Claim 9 stands rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Bach, Haviv and Speight in further view of Auerbach et al (US Patent 6,549,937). Claims 1-5 and 13-23 stand rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Haviv in view of Sitbon. These contentions are respectfully traversed.

Independent claims 1, 5, 16 and 20 are directed to translation of a call corresponding to an application program interface (API) for a first transport-layer connection-oriented protocol to one or more protocol messages defined by a second transport-layer connection-oriented protocol, if the call and the file descriptor are of a first type, where the one or more

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protocol messages are recognized by a node or device that obtains the one or more protocol messages for processing according to the first transport-layer connection-oriented protocol. (Emphasis added.) The art of record fails to teach or suggest this claimed subject matter.

Bach describes distributed API processing across a high speed I/O (Input/Output) channel. (See Bach at Abstract.) High speed I/O channels in mainframe computers have "the ability to transfer data into or out of the system without intervention from the main processor." (See Bach at col. 3, lines 11-16.) The distributed API accepts API commands and routes them to multiple front end processors/routers over high speed I/O channels. (See Bach at col. 5, lines 2-6 and lines 52-61.) The cited portions of Bach (claims 1 and 3) cover "a host system data transfer protocol for transporting data messages within the host system and over the input output channel". Bach does not describe performing translation from a call to a protocol message <u>if the call and the file descriptor are of a first type</u>, as claimed. (Emphasis added.)

Haviv describes a system that enables filtered peer-to-peer communication with improved performance and load-balancing and fail-over mechanisms. (See Haviv at ¶ 0013.) The system may be implemented as an efficient multi-channel reliable network having remote direct memory access (RDMA) capabilities. (See

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Haviv at ¶ 0014.)   The cited portions of Haviv (¶ 0033, ¶ 0049,

and ¶ 0060) describe, respectively, a client computer sending a

command to a router together with pointers to one or more memory

buffers, a server application interface adapted to send and

receive transactions directly to hardware through operations

such as Send and RDMA, and examples of transactions divided into

several elements.   These cited portions, and Haviv generally, do

not describe performing translation from a call to a protocol

message <u>if the call and the file descriptor are of a first type</u>,

as claimed.   (Emphasis added.)

Sitbon describes an address conversion process that allows

translation of a call for a first API, the socket interface for

a TCP/IP network, into a call for a second API, the XTI

interface (X/OPEN transport interface) for an OSI/CO (open

system interconnection / connection-oriented) network.   Sitbon

operates at the application program interface level (socket call

to XTI call) and does not teach or suggest translating an API

call corresponding to a first protocol into one or more protocol

messages defined by a second protocol, if the call and the file

descriptor are of a first type.

Thus, the art of record, either alone or in the proposed

combinations, does not describe performing translation from a

call to a protocol message <u>if the call and the file descriptor

are of a first type</u>, as claimed.   (Emphasis added.)   Independent

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claims 1, 5, 16 and 20 are patentable for at least the above reasons. Dependent claims 2-4, 6-15, 17-19 and 21-23 are patentable based on the above arguments and the additional recitations they contain.

It is believed that all of the pending claims have been addressed. However, the absence of a reply to a specific issue or comment does not signify agreement with or concession of that issue or comment. Because the arguments made above may not be exhaustive, there may be reasons for patentability of any or all pending claims (or other claims) that have not been expressed. Finally, nothing in this paper should be construed as an intent to concede any issue with regard to any claim, except as specifically stated in this paper, and the amendment of any claim does not necessarily signify concession of unpatentability of the claim prior to its amendment.

It is respectfully suggested for all of these reasons, that the current rejections are overcome, that none of the cited art teaches or suggests the features which are claimed, and therefore that all of these claims should be in condition for allowance. Should the Examiner disagree, an interview is respectfully requested to discuss the arguments presented above. Otherwise, a formal notice of allowance is respectfully requested.

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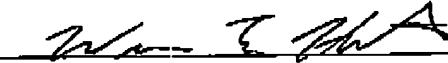
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